

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JASON SWINFORD

VS.

COIL TUBING TECHNOLOGY, INC. and
TOUCAN DOWNHOLE SOLUTIONS, LLC

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Case No. 4:19-cv-02301

PLAINTIFF'S PRIVILEGE LOG

Pursuant to the Federal Rules of Civil Procedure, Plaintiff, Jason L. Swinford (“**Swinford**” or “**Plaintiff**”) hereby serves its Privilege Log to Defendants, Coil Tubing Technology, Inc. and Toucan Downhole Solutions, LLC (collectively “**Defendants**”).

Respectfully submitted,

HIRSCH & WESTHEIMER, P.C.

By: /s/ Eric Lipper

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**ATTORNEYS FOR PLAINTIFF,
JASON L. SWINFORD**

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2020, a true and correct copy of the foregoing and/or attached was served on each attorney of record or party in accordance with **Federal Rule of Civil Procedure 5(b)** as follows:

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/s/ Eric Lipper
Eric Lipper

	DATE	DOC TYPE/DESCRIPTION	AUTHOR	RECEIVER	SECONDARY RECEIVER	PRIVILEGE	DESCRIPTION
1.	10/20/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/Client	Bates Labeled SWINFORD FED PRIVILEGE – 000001- 3
2.	10/29/15	Email re: [REDACTED]	Eric P. Mirabel	Jason Swinford	N/A	Attorney/Client	Bates Labeled SWINFORD FED PRIVILEGE – 000004
3.	10/29/15	Letter re: [REDACTED]	Eric P. Mirabel	Jason Swinford, Jerry Swinford	N/A	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000005- 11
4.	10/29/15	Email re: [REDACTED]	Jason Swinford	Eric Mirabel P.	Jerry Swinford	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000012- 13
5.	Undated	Attachment to Document 4, entitled [REDACTED]	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000014- 26
6.	Undated	Attachment to Document 4, entitled [REDACTED]	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000027- 32
7.	11/02/15	Email re: [REDACTED]	Eric P. Mirabel	Jason Swinford	N/A	Attorney/client	Bates Labeled SWINFORD FED PRIVILEGE – 000033
8.	11/02/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford; Jerry Swinford	N/A	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000034
9.	11/18/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE –

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10.	Undated	Attachment to Document 8, entitled: "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000036- 39
11.	Undated	Attachment to Document 8, entitled "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000040- 45
12.	Undated	Attachment to Document 8, "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000046- 47
13.	Undated	Attachment to Document 8, "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000048- 60
14.	Undated	Attachment to Document 8, "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000061- 73
15.	Undated	Attachment to Document 8, "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000074- 75
16.	Undated	Attachment to Document 8, "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000076- 79
17.	Undated	Attachment to Document 8, "██████"	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000080- 89
18.	12/1/15	Email re: ██████	Eric Mirabel	Jason Swinford	N/A	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000090

	DATE	DOC TYPE/DESCRIPTION	AUTHOR	RECEIVER	SECONDARY RECEIVER	PRIVILEGE	DESCRIPTION
19.	11/30/15	Attachment to Document 18, [REDACTED] [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000091- 92